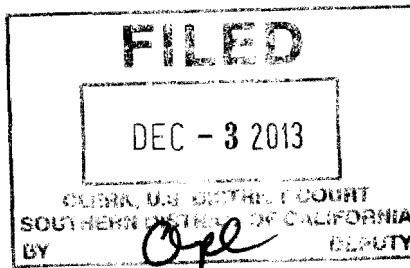


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21 Attorneys for the United States

22 **UNITED STATES DISTRICT COURT**

23 **SOUTHERN DISTRICT OF CALIFORNIA**

24 UNITED STATES OF AMERICA,

25 Plaintiff,

26 v.

27 LEONARD GLENN FRANCIS (1),
28 and JOSE LUIS SANCHEZ (2),

Defendants.

Case No.: 13cr4287-JLS

INFORMATION

Title 18, U.S.C., Sec. 371 – Conspiracy to
Commit Bribery

1
2 The United States charges that, at all times relevant to this Information:

3 1. Defendant LEONARD GLENN FRANCIS was a citizen of Malaysia,
4 residing in Singapore. FRANCIS was the Chief Executive Officer and President of
5 Glenn Defense Marine (Asia) ("GDMA"), a corporation organized under the laws of
6 Singapore, which provided "husbanding" services under contracts with the U.S. Navy
7 to support the Navy's operations in the Pacific Ocean. "Husbanding" involves the
8 coordinating, scheduling, and direct and indirect procurement of items and services
9 required by ships and submarines when they arrive at port.

10 2. Defendant JOSE LUIS SANCHEZ is a Commander with the U.S. Navy.
11 SANCHEZ served in Japan and Singapore from at least in or about April 2006
12 through in or about April 2013, supporting the U.S. Navy's operations in the Far East
13 in the following capacities: from in or about April 2006 to in or about April 2008, as
14 the Deputy Logistics Officer for the Commander of the U.S. Seventh Fleet; from in or
15 about April 2008 through in or about May 2012, as the Director of Operations for the
16 Fleet Logistics Command in Singapore; and from in or about May 2012 until in or
17 about April 2013, as the Executive Officer for the Commanding Officer at the Fleet
18 Logistics Command in Yokosuka, Japan. Since in or about April 2013, he has been
19 assigned to the U.S. Central Command in Florida.

20 3. As an officer in the U.S. Navy, SANCHEZ was a "public official" as defined
21 in 18 U.S.C. § 201(a). It was a violation of his official and lawful duties to transmit
22 information that the U.S. Navy had classified as "Confidential" or "Secret" to any
23 person not entitled to receive it, and to make unauthorized disclosures of proprietary,
24 internal U.S. Navy information.

25 4. This crime having been committed on the high seas and outside any
26 particular district, FRANCIS was arrested in the Southern District of California for his
27 role in the offense charged in this Information.

28 //

1 THE CONSPIRACY

2 5. Beginning in or about January 2009, continuing to in or about February
3 2013, on the high seas and outside any particular district, defendants FRANCIS and
4 SANCHEZ knowingly conspired to commit bribery, in violation of Title 18, United
5 States Code, Sections 201(b)(1)(A) and (C), and (b)(2)(A) and (C).

6 OBJECT OF THE CONSPIRACY

7 6. It was the object of the conspiracy for FRANCIS to offer and provide things
8 of value to or on behalf of SANCHEZ, including travel expenses, entertainment, and
9 prostitutes, in return for SANCHEZ providing classified and other internal U.S. Navy
10 information to FRANCIS, and being influenced in the performance of his official acts.

11 METHODS AND MEANS OF THE CONSPIRACY

12 7. In furtherance of this conspiracy, and to accomplish its object, the following
13 methods and means were used, among others:

14 a. FRANCIS would give, offer, and promise things of value to or on
15 behalf of SANCHEZ, including travel expenses, entertainment, and prostitutes.

16 b. SANCHEZ would demand, seek, receive, accept and agree to
17 receive and accept these things of value from FRANCIS.

18 c. In exchange for things of value, SANCHEZ would provide
19 FRANCIS with classified and other internal U.S. Navy information, advise FRANCIS
20 on how to address concerns that the U.S. Navy had raised about GDMA's husbanding
21 services and invoices, and make recommendations and use his influence with the U.S.
22 Navy to benefit FRANCIS and GDMA.

23 OVERT ACTS

24 8. In furtherance of the conspiracy and to effect its object, the following overt
25 acts, among others, were committed:

26 a. In or about August 2011, FRANCIS paid for a prostitute for
27 SANCHEZ in Manila, Philippines.

1 b. On or about May 23, 2011, SANCHEZ emailed FRANCIS 22
2 pages of internal U.S. Navy ship movement schedules for the following three months,
3 which he was not authorized to disclose to FRANCIS.

4 All in violation of Title 18, United States Code, Section 371.

5 **FORFEITURE ALLEGATIONS**

6 9. The allegations set forth in paragraphs 1 through 8 of this Information are
7 incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18,
8 United States Code, Section 981(a)(1)(c), and Title 28, United States Code, Section
9 2461(c).

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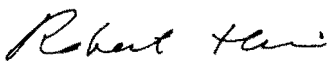
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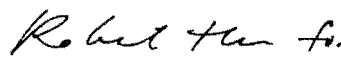
1 10. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby
2 given to the above-named defendants that the United States will seek forfeiture as part
3 of any sentence in accordance with Title 18, United States Code, Section 981(a)(1)(c),
4 and Title 28, United States Code, Section 2461(c), including but not limited to all
5 property, real or personal, which constitutes or is derived from proceeds traceable to
6 bribes or a bribery conspiracy, as alleged in this Information.

7 DATED: December³, 2013.

8
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